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November 13, 2020

Honorable Andrew E. Krause
United States Magistrate Judge
United States District Courthouse
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

APPLICATION GRANTED


Hon. Andrew Krause, U.S.M.J.

11/13/2020

BY ECF AND EMAIL/PDF

Re: USA v. Shawn Johnson, 20-mj-08306
Request to Modify Pretrial Conditions of Release

Dear Judge Krause:

I am appointed to represent the defendant pursuant to CJA. On August 11, 2020, at Mr. Johnson's initial appearance, conditions were set by the Honorable Paul E. Davison for the defendant's release which included, among other requirements, \$100,000.00 Personal recognizance bond secured by five financially responsible persons, \$5,000.00 cash security, home incarceration, electronic monitoring travel restrictions and drug testing (See, ECF No. 4).

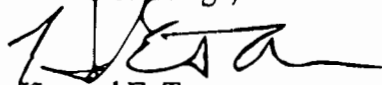
I write to the Court to request modifications of these conditions, specifically, for the removal of the home incarceration condition to be replaced with a curfew to be set at the discretion of Pretrial Services. I am informed that Mr. Johnson has been in complete compliance with all pretrial conditions of release since the inception of this case and has recently enrolled in two college classes which he is attending remotely.

I have corresponded with AUSA Derek Wikstrom and U.S. Pretrial Services Officer Andrew Abbott, who both consent to this application.

Thank you, Your Honor, for your consideration of this matter.

Very truly yours,

Tanner & Ortega, L.L.P.


Howard E. Tanner

cc: AUSA Derek Wikstrom (By ECF and Email/PDF)
U.S. Pretrial Services Officer Andrew Abbott (By ECF and Email/PDF)